

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RONARD LORA, HUGO RIVERA, MARCO
ANTONIO DIAZ, MELVIN LORA, EDUARDO
LORA, GIOVANNI PAULINO, JOSE RODRIGUEZ,
and JOSE RODOLFO RODRIGUEZ-TINEO,
Individually and on behalf of all others similarly
Situating,

Plaintiffs,

-against-

J.V. CAR WASH, LTD., BROADWAY HAND
CAR WASH CORP., WEBSTER HAND
CAR WASH CORP., HARLEM HAND
CAR WASH INC., BAYWAY HAND
CAR WASH CORP., JOSE VAZQUEZ,
SATURNINO VARGAS, JOSE JIMENEZ,
RAMON PEREZ, DOMINGO "DOE."
ADOLFO FEDERUS, originally sued as ADOLFO
"DOE," and JOHN DOES 1-10

Defendants

Hon. Louis L. Stanton

Case No.: 11-CV-9010 (LLS)

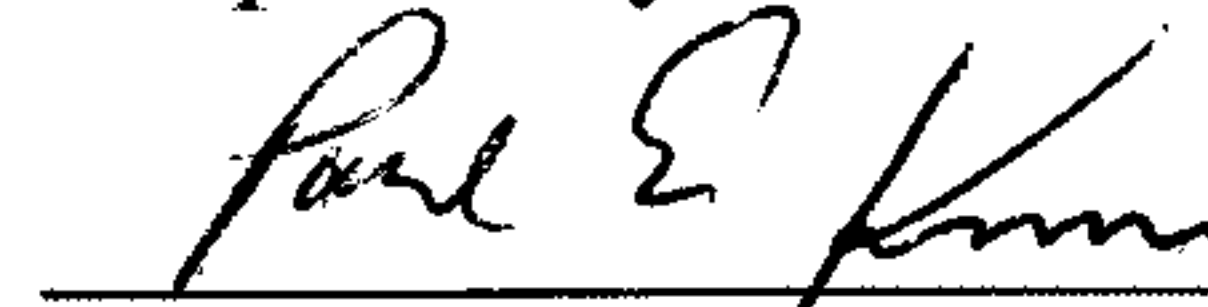
**NOTICE OF MOTION TO WITHDRAW AS COUNSEL OF RECORD
AND STAY PROCEEDING**

PLEASE TAKE NOTICE that, upon the annexed Affirmation of Paul E. Kerson, Esq., in support of Motion to Withdraw as Counsel and Stay Proceedings, dated June 14, 2013, and upon the annexed letter of defendant, **JOSE VAZQUEZ**, dated June 7, 2013, and the Affidavit of **JOSE VAZQUEZ**, duly sworn to on the 14th day of June, 2013, Attorney of Record, Paul E. Kerson, Esq. will move this Court, Honorable Louis L. Stanton presiding, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date to be set by the Court for an Order to Withdraw as counsel of record on behalf of all Defendants

and to stay this action for sixty (60) days to allow defendants to adequately prepare for trial and replace counsel pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and the discretion of the Court, and for such further relief the Court deems just and appropriate under the circumstances.

Dated: June 14, 2013
New York, New York

Respectfully Submitted,



PAUL E. KERSON, ESQ.

Leavitt & Kerson, Esqs.

Attorneys for Defendants

228 E. 45th Street, 17th Floor

New York, NY 10017

Tel. (212) 973-9339